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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION

14 UNITED STATES OF AMERICA,) NO. CR-21-00429 YGR
15 Plaintiff,) [FILED NOVEMBER 2, 2021]
16 v.)
17 RAY J. GARCIA,)
18 Defendant.)

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20 UNITED STATES OF AMERICA,) NO. CR-22-00031 YGR
21 Plaintiff,) [FILED JANUARY 28, 2022]
22 v.) NOTICE OF RELATED CASE IN A CRIMINAL
23 ROSS KLINGER,) ACTION
24 Defendant.)

1 UNITED STATES OF AMERICA,) NO. CR-22-00066-YGR
2 Plaintiff,) [FILED FEBRUARY 17, 2022]
3 v.) NOTICE OF RELATED CASE IN A CRIMINAL
4 JOHN RUSSELL BELLHOUSE,) ACTION
5 Defendant.)
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7 UNITED STATES OF AMERICA,) NO. CR-22-00104-YGR
8 Plaintiff,) [FILED MARCH 10, 2022]
9 v.) NOTICE OF RELATED CASE IN A CRIMINAL
10 ENRIQUE CHAVEZ,) ACTION
11 Defendant.)
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13 UNITED STATES OF AMERICA,) NO. CR-23-00110-YGR
14 Plaintiff,) [FILED APRIL 13, 2023]
15 v.) NOTICE OF RELATED CASE IN A CRIMINAL
16 DARRELL WAYNE SMITH,) ACTION
17 a/k/a "Dirty Dick Smith,")
18 Defendant.)
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20 UNITED STATES OF AMERICA,) NO. CR-23-00212-HSG
21 Plaintiff,) [FILED JULY 13, 2023]
22 v.) NOTICE OF RELATED CASE IN A CRIMINAL
23 ANDREW JONES,) ACTION
24 Defendant.)
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1 UNITED STATES OF AMERICA,) NO. CR-23-00213-HSG
2 Plaintiff,) [FILED JULY 13, 2023]
3 v.) NOTICE OF RELATED CASE IN A CRIMINAL
4 NAKIE NUNLEY,) ACTION
5 Defendant.)

7 Pursuant to Local Criminal Rule 8-1, the United States of America hereby notifies the Court that
 8 the seven above-captioned criminal cases are related. In CR-21-00429, Ray J. GARCIA was charged
 9 with three counts of sexual abuse of a ward in violation of 18 U.S.C. § 2243(b), four counts of abusive
 10 sexual contact in violation of 18 U.S.C. § 2244(a)(4), and one count of making a false statement to a
 11 government agency in violation of 18 U.S.C. § 1001(a)(2). The conduct occurred between
 12 December 2019 and July 2021 while GARCIA was the associate warden and then warden at BOP
 13 Federal Correctional Institute in Dublin (hereafter “FCI Dublin”).

14 In CR-22-00031, Ross KLINGER is charged with three counts of sexual abuse of a ward in
 15 violation of 18 U.S.C. § 2243(b). The conduct occurred in 2020 while KLINGER was a correctional
 16 officer at FCI Dublin, and GARCIA was the associate warden.

17 In CR-22-00066, John Russell BELLHOUSE is charged with two counts of sexual abuse of ward
 18 in violation of 18 U.S.C. § 2243(b) and three counts of abusive sexual contact in violation of 18 U.S.C.
 19 § 2244(a)(4). The conduct occurred between December 2019 and December 2020 while BELLHOUSE
 20 was KLINGER’s supervisor on the Safety & Recycling crew at FCI Dublin, and while GARCIA was the
 21 associate warden and then warden.

22 In CR-22-00104, Enrique CHAVEZ was charged with two counts of abusive sexual contact in
 23 violation of 18 U.S.C. § 2244(a)(4). The conduct occurred in October 2020 while CHAVEZ was a
 24 correctional officer at FCI Dublin, and GARCIA was the associate warden.

25 In CR-23-0110, Darrell Wayne SMITH is charged with five counts of sexual abuse of a ward in
 26 violation of 18 U.S.C. § 2243(b), six counts of abusive sexual contact in violation of 18 U.S.C. §
 27 2244(a)(3), and one count of aggravated sexual abuse in violation of 18 U.S.C. § 2241(a). The conduct
 28 occurred between May 2019 and May 2021 while SMITH was a correctional officer at FCI Dublin, and

1 GARCIA was the associate warden and then warden.

2 In CR-23-00212, Andrew JONES is charged with six counts of sexual abuse of a ward in
 3 violation of 18 U.S.C. § 2243(b) and one count of making a false statement to a government agency in
 4 violation of 18 U.S.C. § 1001(a)(2). The conduct occurred between July 2020 and June 2021 while
 5 JONES was a correctional officer at FCI Dublin, and GARCIA was the associate warden and then
 6 warden.

7 In CR-23-0213, Nakie NUNLEY is charged with four counts of sexual abuse of a ward in
 8 violation of 18 U.S.C. § 2243(b), five counts of abusive sexual contact in violation of 18 U.S.C. §
 9 2244(a)(4), and one count of making a false statement to a government agency in violation of 18 U.S.C.
 10 § 1001(a)(2). The conduct occurred between March 2020 and November 2021 while NUNLEY was a
 11 correctional officer at FCI Dublin, and GARCIA was the associate warden and then warden. Thus, all
 12 seven cases involve sexual abuse of a ward at FCI Dublin during the same timeframe. Moreover,
 13 GARCIA supervised KLINGER, BELLHOUSE, CHAVEZ, SMITH, JONES, and NUNLEY during the
 14 timeframe of the abuse.

15 The government anticipates that the evidence that the government produces in these cases will
 16 overlap. All seven cases arose from an investigation into FCI Dublin during the same timeframe, and
 17 many of the interviews conducted by the government, as well as other evidence, pertain to all seven
 18 cases. Based upon these facts, the cases are related within the meaning of Local Criminal Rule 8-1(b)(2)
 19 because these actions appear likely to entail substantial duplication of labor if heard by different Judges
 20 or might create conflicts and unnecessary expenses if conducted before different Judges.

21 Pursuant to Local Criminal Rule 8-1(c)(4), government counsel states that assignment of these
 22 cases to a single judge is likely to conserve judicial resources and promote an efficient determination of
 23 each action.

24 DATED: July 14, 2023

Respectfully submitted,

25 ISMAIL J. RAMSEY
 26 United States Attorney

27 */s/ Andrew Paulson*
 28 ANDREW PAULSON
 Assistant United States Attorney